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Attorney for Plaintiffs and those similarly situated

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Lily Jeung, Amy Sayers, and Darren)	No. CV14-06223 FMO (ASX)
Walchesky, on behalf of themselves )	<b>**SUPPLEMENTAL DECLARATION**</b>
and all others similarly situated )	Motion to take Default of Yelp, Inc.
	) Motion for monetary sanctions
	) against Yelp, Inc. and in-house
	) Aaron Schur,
Plaintiffs,	) Motion that deposition of CEO
	) Jeremy Stoppeman and Vice
	) President controlling writers
vs.	) be permitted after presently set
	) discovery cutoff date or until
Yelp, Inc.	) completed
	) Motion that new mediation be
Defendant.	) Ordered, Yelp, Inc. pays

**Declaration of Daniel A. Bernath, attorney for Plaintiffs**

**More unethical conduct by Yelp, Inc., defendant**

1. Yelp's complaint against me to the California State Bar has triggered Senior State Bar attorney Erin Joyce (who gave her State Bar telephone number of 213 765 1316) to

**\*SUPPLEMENTAL DECLARATION\*\*  
MOTION TO TAKE DEFAULT OF YELP  
SANCTIONS AGAINST AARON SCHUR, ATTORNEY AND  
YELP, INC.; EXTEND DISCOVERY DEADLINE TO TAKE DEPOSITIONS  
MONETARY SANCTIONS TO TAKE DEPOS, TRAVEL, EXPENSES**

1 directly contact my client Lily Jeung by telephone **AT HER JOB** thus placing  
2 plaintiffs' job in jeopardy.

3 **2.** My client does not waive any attorney client communications, now and forever, in the  
4 Yelp instigated frivolous complaint and will not speak to Erin Joyce or any other attorney  
5 or person at the California State Bar, as Yelp explore every unethical avenue to disrupt  
6 the Court's processes.

7 **3.** It appears that Yelp, Inc. has provided the State Bar discipline trial lawyer with **my**  
8 **client's work telephone number** from Yelp's records and as a violation of my  
9 client's privacy rights and did this to put Lily Jeung's job in jeopardy. This unethical  
10 pressure against plaintiff, so that my client will wish to withdraw from the case rather  
11 than have to deal with the California State Bars intrusiveness into her life, along with  
12 Yelp's blatant attempt to disrupt her family life (see below).

13 **Defendant Yelp, Inc.'s ongoing attempts to disrupt the Jeung family**

14 **And successful actions to damage Plaintiffs' uncle's businesses**

15 **4.** Lily Jeung, plaintiff has an uncle who owns and operates a restaurant and a medium  
16 sized market.

17 **5.** Yelp, Inc. operatives have falsely stated that Lily owns the restaurant and the market.  
18 She has no interest in those businesses whatsoever and is a woman who works for an  
19 employer.

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1       6. Yelp, Inc. operatives have contacted Lily Jeung's Uncle and convinced him that because  
2       of Lily Jeung's efforts to be paid for her labors for Yelp that his restaurant and market  
3       have been "boycotted" by Yelp "Elites" and other followers of this cult-like Yelp.

4       7. Lily's uncle, being urged to do so by Yelp, Inc. personnel, has passed along Yelp's  
5       threatening message that Lily Jeung must drop this lawsuit for back wages and that  
6       because Lily is use this legal process to get what is owed her that Lily is "**making**  
7       **trouble for the family**" and "**causing drama**" and is hurting her Uncle's  
8       business. Yelp has convinced the Uncle that going to court to settle disputes is "stirring  
9       the pot" and that plaintiff Lily Jeung should "**just let it go**" because the wages  
10      recovered from Yelp in this lawsuit will be very small compared to the Jeung businesses  
11      being forced into failure and bankruptcy.

12     8. Yelp operatives have also told Lily's Uncle several lies about Lily to draw a wedge  
13      between the family members.

14     9. Yelp operatives have told Lily's family members that Lily plagiarized her writings, all in  
15      an attempt to make Lily look bad to her family.

16     10.                   Lily's uncle will not even speak to Lily because of Yelp's  
17      disruptions within the Jeung family, which Yelp has convinced the Uncle is "stirring the  
18      pot" and causing customers to boycott his restaurant and market.

19             a. Thus, Yelp continues its mafia like techniques  
20               to drive a wedge between plaintiffs' counsel and plaintiffs;

21             b. cause Lily Jeung to become discouraged and let the theft of her services go un-  
22               remedied,

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1 c. cause the Jeung family to be torn apart.

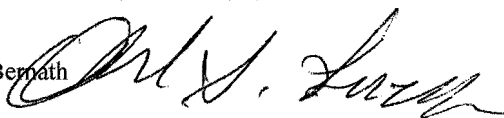
2 d. Make the use of this Court so burdensome to plaintiffs' counsel, having to defend  
3 against the Yelp frivolous California State Bar complaint that I, and any other  
4 attorney would think-twice before suing Yelp, Inc.

5 11. Plaintiffs' family business is hurting financially now and Plaintiffs' uncle blames Yelp's  
6 boycotting of the Jeung businesses. Yelp is doing this boycott and defamation about the  
7 Jeung family because it mistakenly believes that the restaurant and market is owned by  
8 Plaintiff Lily Jeung-it is not. She has no interest in that business of any degree. Even if  
9 she did, Yelp, Inc. may not drive a restaurant and a market out of business because a  
10 person uses this Court to enforce her rights and seek her remedies for having her labors  
11 stolen.

12 12. The only way that the Yelp operatives (aka as "Billion Dollar Bully") could make the  
13 assumption that plaintiff Lily Jeung owns any business is by searching business filings  
14 and records that a Jeung owns the businesses and then incorrectly assuming that a Jeung  
15 is a Jeung-thus beginning their mafia like attack on the market and restaurant.

16 I swear under penalty of perjury that the foregoing is true and correct.

17 Daniel A. Bernath



18 I swear under penalty of perjury on 4.16.2015 that have served this motion upon Yelp,  
19 Inc. by and through their counsel but also by US Mail to:

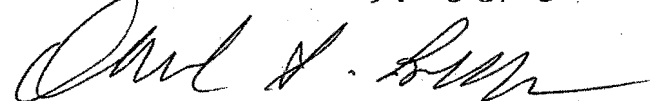
20 Aaron Schur, Attorney at Law

21 Yelp, Inc.

22 140 New Montgomery St

23 Fl 9.

24 SAN FRANCISCO CA 94105-3705



25  
26  
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